December 4, 2009

VIA ELECTRONIC FILING

Marlene H. Dortch, Secretary
Federal Communications Commission
445 Twelfth Street S.W.
Washington, DC 20554

      Re: *Letter of XO Communications, LLC in Response to NBP Public
Notice #18, GN Docket Nos. 09-47, 09-51, 09-137*

Dear Ms. Dortch:

      XO Communications, LLC ("XO Communications") hereby responds to the Federal
Communications Commission's ("FCC's" or "Commission's") NBP Public Notice #18
regarding the relationship between broadband services and economic opportunities.[1] XO
Communications continues to believe that as the Commission develops its national broadband
strategy, it should strongly consider the benefits, including economic gains, that would result
from the widespread deployment of Ethernet-over-copper ("EoC") technology.

      Ethernet-over-copper technology can make a substantial contribution to broadband
development in the United States. EoC technology supports data speeds up to 45 Mbps today
and possibly greater than 100 Mbps in the future, and provides consumers with benefits and
functionality that are comparable to fiber-based Ethernet service. Moreover, given the
ubiquitous nationwide reach of copper facilities, EoC can be utilized for faster and more cost-
effective deployment of broadband than other wireline technologies, including the fiber facilities
that currently extend to less than twenty percent of the nation's business locations and require
millions of dollars in up-front capital costs.[2]

      Given these factors, XO and other competitive LECs are utilizing EoC technology to
extend the reach of their metro and wide area Ethernet networks to business and other customer
locations beyond the reach of fiber. Carriers will be able to use EoC technology to meet the

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[1]   NBP Public Notice #18, *Comment Sought on Relationship Between Broadband and Economic Opportunity*,
DA 09-2414 (rel. Nov. 12, 2009) ("NBP Public Notice #18").

[2]   *See Leveraging Installed Copper to Reach Underserved and Unserved Community Anchor Institutions*,
Hatteras Networks, at 6 (filed in GN Docket No. 09-51 on June 8, 2009) ("Hatteras Networks Report") (citing
Vertical Systems Group, "Got Business Fiber? U.S. Fiber Penetration," *available at*:
<http://www.verticalsystems.com>).

demand for high-bandwidth services of businesses, governmental agencies, and other community "anchor tenants," such as hospitals, schools, and libraries. These customers rely on Ethernet-based services for wide-area solutions that can connect their disparate locations and provide robust packet data network bandwidth.[3]

As XO Communications has previously described, EoC promises important economic benefits for rural, underserved, and unserved areas of the United States.[4] EoC broadband services can promote regional economic development by encouraging small, medium, and large businesses that rely on high-speed transmission services to migrate to these rural and remote areas. As broadband Ethernet provider Hatteras Networks has noted, "EoC provides the high bandwidth, symmetric, and cost effective last mile Ethernet access required to attract new small and medium businesses and large enterprise businesses to the target un/underserved areas."[5]

Given the economic and other benefits of such copper-based technologies as EoC, the FCC should accord an integral role to the United States' existing copper infrastructure as it develops a pro-competitive National Broadband Plan. Given its near ubiquity and increasingly robust capabilities, the nation's legacy copper loop plant represents a ready-made solution for expanding broadband access around the country.

Respectfully submitted,

/s/ Heather Burnett Gold
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[3]   See, e.g., Hatteras Networks Report at 3-4.

[4]   See Comments on Broadband NOI, XO Communications, LLC, GN Docket No. 09-51, at 10-12 (June 8, 2009); Reply Comments of XO Communications, LLC, GN Docket No. 09-51, at 11-14 (July 21, 2009).

[5]   Hatteras Networks Report at 4.